

Application Serial No. 10/551,817  
Reply to Office Action of 03/13/2008

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**PATENT**  
Docket No. CU-4448

**REMARKS/ARGUMENTS**

Reconsideration is respectfully requested.

Claims 1-4 are pending in the present application. No new matter has been added.

In the office action, claims 1-3 stand rejected under 35 U.S.C. § 103(a) as being obvious over applicant's admitted prior art (AAPA) in view of U.S. Patent No. 6,018,521 (Timbs). The "et al." suffix is omitted in this paper.

The applicants respectfully disagree and submit that the claims, as they now stand, are in condition for allowance.

The office action uses Timbs to disclose "one data transmission management board (fig 1b) that has the mapping for both the first and second ATM interface board (Fig. 1a, label 251) which performs the similar functionalities of both the first and the second ATM interface board, wherein said data transmission management board is the same during the user equipment handover procedure (fig. 1b, column 7 line 3 - column 10, line 4) to improve the cost efficiency due to reduced number of boards required."

The applicants respectfully disagree with this above-rendition of Timbs. In particular, the applicants respectfully assert that Timbs does not disclose "data transmission management board". Further the applicants respectfully assert that Timbs does not disclose "the first and the second ATM interface board". Yet further, the applicants respectfully assert that Timbs does not disclose "said one of the plurality of data transmission management boards is the same during the user equipment handover procedure." Finally, the applicants respectfully assert that Timbs does not disclose the technical problem of the present invention.

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One of the inventive points of the present invention in claim 1 is that: said one of a plurality of data transmission management boards is the same during the user equipment handover procedure. The presently claimed invention is realized using a radio network controller (RNC) having a distributed architecture. As recited in the background of the invention, since the amount of data flow is comparatively large, the function of managing data transmission is generally realized in a plurality of processing boards, with one processing board providing services for a certain number of handsets (UE). One of the technical problems solved by this inventive point is to avoid or minimize increases in signaling load between boards and to avoid or minimize degradation in the resultant call handling capability of the RNC system caused by frequent UE handover.

However, assuming the examiner's assertion that Timbs is directed to improve the cost efficiency due to reduced number of boards required is truth, it is respectfully submitted that a person of ordinary skill in the art would not have been motivated to consider disclosure of Timbs to avoid increasing of signaling load between boards and degrading of call handling capability of the RNC system caused by frequent UE handover.

What is recorded in Timbs is that: the Base Station Controller (BSC) subsystem 220 constitutes the call processing control platform for the Base Station subsystem 200 (see column 8, lines 1-5 in Timbs). This Base Station Controller (BSC) subsystem 220 provides real time call processing functionality. It performs the signaling interface with the MSC 230, radio resource management (i.e., channel allocation), and coordination of radio resources to effect operations such as originations, terminations, and handoffs

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(see column 8, lines 62-67 in Timbs).

According to the above disclosure in Timbs, with reference to fig 1b, it can be seen that call processing functionality is performed in a single Base Station Controller (BSC) subsystem 220. As compared with the embodiment of the present invention, where the function of the data transmission would be performed in a single radio network controller (RNC). From this viewpoint, it is submitted that BSC 220 in Timbs equals to the RNC in the present invention. The RNC in the present invention includes a plurality of data transmission management boards and interface ATM boards, and one of the plurality of data transmission management boards is the same during the user equipment handover procedure. However, no disclosure of data transmission management board has been found in the BSC 220 in Timbs, let alone one same data transmission management board is kept during the user equipment handover procedure.

As asserted in the Office Action, the ATM switch 251 in fig 1A of Timbs performs the similar functionalities of both the first and the second ATM interface board. The applicant again respectfully disagrees with this rendition of Timbs. In particular, the applicant respectfully asserts that the RNC in the present invention includes a plurality of interface ATM boards for realizing data interaction with other functional boards of RNC which is quite different than what Timbs discloses.

As to the ATM switch 251, what is recorded in Timbs is that: the BSC 220 manages the ATM connections between the XC 252, NI 254, BTSI 253, and ATM switch 251 ... (see fig 1a, column 7, lines 33-34 in Timbs). The BSC 220 manages of the various call connection paths and set-up and transfer of operations back and forth between them, via the ATM switch 251 (see column 9, lines 17-19 in Timbs).

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It can be seen from the above disclosure in Timbs that both the ATM switch 251 and the BSC 220 are included in the Base Station System BSS 200. According to the present invention, a plurality of interface ATM boards are included in the RNC. As mentioned above, BSC 220 equals to RNC, therefore, the relationship between ATM switch 251 and BSC 220 is quite different from that between the interface ATM boards and RNC. Additionally, Timbs does not suggest that BSS 200 would include a plurality of ATM switch 251. This is obviously different with that of a plurality of ATM interface boards are included in RNC. Therefore, Timbs does not disclose a plurality of ATM interface board, let alone "a first ATM interface board" and "a second ATM interface board".

Accordingly, it is respectfully submitted that the combination of the AAPA and Timbs do not render claim 1 unpatenable.

Claims 2-4, contain by reference all the limitations of claim 1, and hence, are patentable for at least the same reasons.

In the office action, claim 4 stands rejected under 35 U.S.C. § 103(a) as being obvious over AAPA in view of Timbs and further in view of U.S. Pat. Appl. Publ. No. 2002/0021689 (Robbins).

The applicants respectfully submit that claim 4 is also allowable at least since it depends from claim 1, which is now considered to be in condition for allowance for the reasons above.

For the reasons set forth above, the applicants respectfully submit that claims 1-4, now pending in this application, are in condition for allowance over the cited references. Accordingly, the applicants respectfully request reconsideration and


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withdrawal of the outstanding rejections and earnestly solicit an indication of allowable subject matter. This amendment is considered to be responsive to all points raised in the office action. Should the examiner have any remaining questions or concerns, the examiner is encouraged to contact the undersigned attorney by telephone to expeditiously resolve such concerns.

Respectfully submitted,

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